

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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IN RE:	:	CHAPTER 13
	:	
	:	
John E. DeLack	:	
	:	CASE NO: 1:19-bk-01223-HWV
	:	
Debtor	:	

MOTION TO MODIFY CONFIRMED CHAPTER 13 PLAN

NOW COMES Debtor, John E. DeLack (“Debtor”), by and through his counsel, John M. Hyams, and respectfully requests that this Honorable Court approve a modification of his confirmed Chapter 13 Plan, and as reasons therefor states as follows:

1. Debtor filed his Voluntary Petition in Chapter 13 Bankruptcy on March 27, 2019.
2. Debtor’s Chapter 13 Plan was confirmed on August 15, 2019 (the “Confirmed Plan”).
3. It has been determined that the Debtor has a liability of \$0.00 to the Pennsylvania Department of Revenue.
4. Debtor wishes to amend his Confirmed Chapter 13 Plan to reflect the liability of \$0.00 to the Pennsylvania Department of Revenue.
5. Debtor hereby files this Motion to Modify his Chapter 13 Plan for the remaining life of the Chapter 13 Plan. Debtor hereby requests such modification, in accordance with Section 1329(a) of the Bankruptcy Code.

6. Debtor's proposed Second Amended Chapter 13 Plan is attached hereto as Exhibit "A".

WHEREFORE, Debtor requests that this Honorable Court grant Debtor leave to modify his Confirmed Chapter 13 Plan in accordance with the revised provisions herein.

LAW OFFICES OF JOHN M. HYAMS

Dated: February 1, 2021

By: /s/ John M. Hyams
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